

HEARING DATE: April 30, 2024, AT 9:00 A.M. (EST)

**TOGUT, SEGAL & SEGAL LLP**

Frank A. Oswald

Brian F. Moore

One Penn Plaza, Suite 3335

New York, NY 10119

Phone: (212) 594-5000

Email: frankoswald@teamtogut.com

bmoore@teamtogut.com

*Counsel to the Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

VENUS LIQUIDATION INC., *et al.*

Debtors.<sup>1</sup>

Chapter 11

Case No. 23-10738 (JPM)

(Jointly Administered)

**AGENDA FOR MATTERS SCHEDULED FOR HEARING ON  
APRIL 30, 2024 AT 9:00 AM (PREVAILING EASTERN TIME)  
*(Hybrid Hearing: "In Person" or via "Zoom for Government")***

**Time and Date of Hearing:** April 30, 2024, at 9:00 a.m.  
(prevailing Eastern Time)

**Copies of Motions:** A copy of each pleading can be viewed at the website of the Debtors' claims and noticing agent at:  
<https://cases.stretto.com/vice>, or available for a fee on the Court's website at [www.ecf.uscourts.gov](http://www.ecf.uscourts.gov).

The hearing will be held on **April 30, 2024, at 9:00 AM (ET)** before the Honorable Judge John P. Mastando III, United States Bankruptcy Judge for the United States Bankruptcy Court for the Southern District of New York (the "**Court**"). The Hearing will be conducted as a Hybrid Hearing: either "in person" or remotely using "**Zoom for Government**". Parties wishing to appear at the Hearing, whether making a

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are: Vice Group Holding Inc. (4250); Vice Impact Inc. (9603); Vice Media LLC (5144); Villain LLC (3050); Boy Who Cried Author LLC (6199); Carrot Operations LLC (1596); Carrot Creative LLC (8652); Channel 271 Productions LLC (1637); Clifford Benski, Inc. (9387); Dana Made LLC (1065); Inverness Collective LLC (6542); JT Leroy Holding LLC (7555); PLDM Films LLC (5217); Project Change LLC (2758); R29 Pride, LLC (7011); R29 Productions, LLC (6344); Refinery 29 Inc. (7749); Valvi LLC (6110); Vice Content Development, LLC (5165); Vice Distribution LLC (5515); Vice Europe Holding Limited (N/A); Vice Europe Pulse Holding Limited (N/A); Vice Food LLC (1693); Vice Holding Inc. (2658); Vice International Holding, Inc. (5669); Vice Music Publishing LLC (3022); Vice Payroll LLC (6626); Vice Productions LLC (5399); Vice Project Services LLC (6473); Virtue Worldwide, LLC (7212); Visur LLC (9336); and VTV Productions LLC (6854). The location of the Debtors' service address for purposes of these chapter 11 cases is: 49 South 2<sup>nd</sup> Street, Brooklyn, NY 11249.

“In person” “live” or “listen only” appearance before the Court, must make an electronic appearance utilizing the Electronic Appearance portal located at the Court’s website at: <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>. Appearances must be entered no later than **April 29, 2024, at 4:00 p.m. (Prevailing Eastern Time)** (the “Appearance Deadline”). After the Appearance Deadline has passed, parties who have made their electronic appearance through the Court’s website to appear via Zoom for Government will receive an invitation from the Court with a Zoom link that will allow them to attend the Hearing. Requests to receive a Zoom link should not be emailed to the Court, and the Court will not respond to late requests that are submitted on the day of the hearing. Further information on the use of Zoom for Government can be found at the Court’s website at <https://www.nysb.uscourts.gov/zoomvideohearing-guide>.

**I. CONFIRMATION MATTERS:**

1. *Notice of Combined Hearing to Consider Approval of Disclosure Statement on Final Basis and Plan Confirmation* [Docket No. 839].

Objection Deadline: April 4, 2024, at 4:00 p.m. (prevailing Eastern Time).

Responses: None.

Related Filings:

- a. *Chapter 11 Plan of Liquidation for Venus Liquidation Inc. (f/k/a Vice Group Holding Inc.) and Certain of its Affiliates* [Docket No. 664].
- b. *Affidavit of Service re: Chapter 11 Plan of Liquidation for Venus Liquidation Inc. (f/k/a Vice Group Holding, Inc.) and Certain of Its Affiliates (Docket No. 664)* [Docket No. 672].
- c. *Disclosure Statement for Chapter 11 Plan of Liquidation for Venus Liquidation Inc. (f/k/a Vice Group Holding Inc.) and Certain of its Affiliates* [Docket No. 780].
- d. *Notice of Hearing and Debtors’ Application for an Order (I) Approving Certain Key Dates Relating to Confirmation of the Debtors’ Plan, Including Scheduling a Combined Hearing to Consider Approval to Consider Approval of Debtors’ Disclosure Statement and Plan; (II) Approving the Form and Manner of Combined Hearing Notice; (III) Approving Debtors’ Disclosure Statement on A Provisional Basis; and (IV) Approving (A) Procedures for Solicitation, (B) Forms of Ballots, (C) Procedures for Tabulation of Votes; and (D) Procedures for Objections* [Docket No. 781].
- e. *Order (I) Approving Certain Key Dates Relating to Confirmation of the Debtors’ Plan, Including Scheduling a Combined Hearing to Consider Approval to Consider Approval of Debtors’ Disclosure Statement and Plan; (II) Approving the Form and Manner of Combined Hearing Notice; (III) Approving Debtors’ Disclosure Statement on A Provisional Basis; and (IV) Approving (A) Procedures for Solicitation, (B) Forms of Ballots,*

*(C) Procedures for Tabulation of Votes; and (D) Procedures for Objections [Docket No. 798].*

- f. *Affidavit of Service re: Order (related to Docket No. 798). [Docket No. 832].*
- g. *Notice of Filing of Solicitation Version of the Chapter 11 Plan of Liquidation for Venus Liquidation Inc. (f/k/a Vice Group Holding, Inc.) and Certain of its Affiliates [Docket No. 834].*
- h. *Notice of Filing of Solicitation Version of the Disclosure Statement for Chapter 11 Plan of Liquidation for Venus Liquidation Inc. (f/k/a Vice Group Holding, Inc.) and Certain of its Affiliates [Docket No. 836].*
- i. *Affidavit of Service re: Solicitation Materials [Docket No. 840].*
- j. *Notice of Filing of Amended Plan Supplement to the Chapter 11 Plan of Liquidation for Venus Liquidation, Inc. (f/k/a Vice Group Holding, Inc.) and Certain of its Affiliates [Docket No. 859].*
- k. *Affidavit of Service re: Notice of Filing of Amended Plan Supplement to the Chapter 11 Plan of Liquidation for Venus Liquidation, Inc. (f/k/a Vice Group Holding, Inc.) and Certain of Its Affiliates (Docket No. 859) [Docket No. 862].*
- l. *Affidavit of Service (Supplemental) re: Order (I) Approving Certain Key Dates Relating to Confirmation of the Debtors Plan, Including Scheduling a Combined Hearing to Consider Approval of Debtors Disclosure Statement and Plan et al., [Docket No. 863].*
- m. *Affidavit of Service (Supplemental) re: Order (I) Approving Certain Key Dates Relating to Confirmation of the Debtors Plan, Including Scheduling a Combined Hearing to Consider Approval of Debtors Disclosure Statement and Plan et al., [Docket No. 900].*
- n. *Certification of Adam J. Fialkowski of Stretto, Inc. Regarding Voting and Tabulation of Ballots Cast on the Chapter 11 Plan of Liquidation of Venus Liquidation Inc, (F/K/A Vice Group Holding, Inc.) and Certain of Its Affiliates [Docket No. 902].*
- o. *Amended Certification of Adam J. Fialkowski of Stretto, Inc. Regarding Voting and Tabulation of Ballots Cast on the Chapter 11 Plan of Liquidation of Venus Liquidation Inc, (F/K/A Vice Group Holding, Inc.) and Certain of Its Affiliates [Docket No. 905].*
- p. *Notice of Adjournment of Hearing [Docket No. 910].*
- q. *Second Amended Certification of Adam J. Fialkowski of Stretto, Inc. Regarding Voting and Tabulation of Ballots Cast on the Chapter 11 Plan of Liquidation of Venus Liquidation Inc, (F/K/A Vice Group Holding, Inc.) and Certain of Its Affiliates [Docket No. 955].*

- r. *Notice of Filing of Amended Chapter 11 Plan of Liquidation for Venus Liquidation Inc. (f/k/a Vice Group Holding, Inc.) and Certain of its Affiliates* [Docket No. 961].
- s. *Debtors' Memorandum of Law in Support of Confirmation of the Amended Chapter 11 Plan of Liquidation for Venus Liquidation Inc. (f/k/a Vice Group Holding, Inc.) and Certain of Its Affiliates* [Docket No. 962].
- t. *Declaration of Frank A. Pometti in Support of Proposed Findings of Fact, Conclusions of Law, and Order Approving Disclosure Statement and Amended Chapter 11 Plan of Liquidation for Venus Liquidation Inc. (f/k/a Vice Group Holding, Inc.) and Certain of its Affiliates* [Docket No. 963].
- u. *Notice of Filing of Proposed Findings of Fact, Conclusions of Law, and Order Approving Disclosure Statement and Confirming Amended Chapter 11 Plan of Liquidation for Venus Liquidation Inc. (f/k/a Vice Holding Group, Inc.) and Certain of its Affiliates* [Docket No. 964].

Status: This matter is going forward.

## II. FEE APPLICATION:

- 1. *First Interim Fee Application of Katten Muchin Rosenman LLP as Special Counsel for Debtor Vice Group Holding Inc. on Behalf of and at the Sole Direction of the Independent Directors for the Interim Fee Period from July 21, 2023 Through and Including September 30, 2023* [Docket No. 898].

Objection Deadline: April 4, 2024, at 4:00 p.m. (prevailing Eastern Time).

Responses: None.

### Related Filings:

- a. *Notice of Hearing to Consider the First Interim Fee Application of Katten Muchin Rosenman LLP as Special Counsel for Debtor Vice Group Holding Inc. on Behalf of and at the Sole Direction of the Independent Directors for the Interim Fee Period from July 21, 2023, through and Including September 30, 2023* [Docket No. 949].
- b. *Affidavit of Service of First Interim Fee Application* [Docket No. 904].
- c. *Affidavit of Service of Notice of Hearing* [Docket No. 958].

Status: This matter is going forward.

III. ADJOURNED/RESOLVED MATTERS:

Third Omnibus Claims Motion:

1. *Debtors' Third Omnibus Objection to Claims (No Liability)* [Docket No. 846].

Objection Deadline: April 4, 2024, at 4:00 p.m. (prevailing Eastern Time).

Responses:

- a. *Response to Motion filed by on behalf of State of Michigan Department of Treasury* [Docket No. 860].

Related Filings:

- a. *Notice of Hearing to Consider Debtors' Third Omnibus Objection to Claims (No Liability Claims)* [Docket No. 847].
- b. *Affidavit of Service* [Docket No. 853].

Status: This matter is adjourned as it relates only to the following Claims: The Debtors' objection as to Claim Nos. 248 filed by the Internal Revenue Service, and Claim No. 290, filed by the State of Michigan Department of Treasury. In addition, the claim filed by the NYC Dept of Finance, Claim No. 531 has been resolved.

Dated: April 26, 2024  
New York, New York

VENUS LIQUIDATION, INC., *et al.*  
*Debtors and Debtors in Possession*  
*By its Counsel*  
TOGUT, SEGAL & SEGAL LLP,  
By:

/s/Brian F. Moore  
FRANK A. OSWALD  
BRIAN F. MOORE  
JOHN C. GALLEGOS  
One Penn Plaza, Suite 3335  
New York, New York 10119  
Telephone: (212) 594-5000  
[frankoswald@teamtogut.com](mailto:frankoswald@teamtogut.com)  
[bmoore@teamtogut.com](mailto:bmoore@teamtogut.com)  
[jgallego@teamtogut.com](mailto:jgallego@teamtogut.com)